

**UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

David Goulding, Howard Salamon, Robin Goulding))	
and John O'Shea)	
)	Case No. 1:22-cv-05224
Plaintiffs)	
)	Judge Sharon Johnson Coleman
vs.)	Magistrate Judge Sheila Finnegan
)	
Mark Miller)	
)	
Defendant)	

DEFENDANT MARK MILLER'S RULE 26(a) DISCLOSURES

NOW COMES the Defendant, Mark Miller., by and through its attorney, Thomas F. Burke, and pursuant to Federal Rule 26(a) of the Federal Rules of Civil Procedure, make the following initial disclosures pursuant to FRCP 26 (a)(1)(A):

A. The following witnesses are disclosed pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(i) and may be called to testify at trial:

1. Defendant Mark Miller

Mark Miller c/o JOHNSON & BELL, LTD, 33 West Monroe, Suite 2700
Chicago, Illinois, 60603

This witness will testify to his dealings with Plaintiffs, Randall Goulding, stock transfer agents, and Wyoming and Colorado Secretary of State offices. This witness may testify consistently with his deposition if taken.

2. Plaintiff, David Goulding

This witness may be called as an adverse witness and/or cross-examined on issues related to Capitol Capital Corporation ("CCC"), including his observations, recollections, and perceptions of events relating to the ownership, contracts and operation of CCC and Indo Global common stock. He may be questioned regarding any issues raised during his deposition. He will also be examined on all issues identified by any of the parties in their Answers to Interrogatories, Rule 26(a) disclosures, and Response to Notice to Produce.

Plaintiff Howard Salamon

This witness may be called as an adverse witness and/or cross-examined on issues related to Capitol Capital Corporation (“CCC”), including his observations, recollections, and perceptions of events relating to the ownership, contracts and operation of CCC and Indo Global common stock. He may be questioned regarding any issues raised during his deposition. He will also be examined on all issues identified by any of the parties in their Answers to Interrogatories, Rule 26(a) disclosures, and Response to Notice to Produce.

Randall Goulding

This witness may be called as an adverse witness and/or cross-examined on issues related to Capitol Capital Corporation (“CCC”), including his observations, recollections, and perceptions of events relating to the ownership, contracts and operation of CCC and Indo Global common stock. He may be questioned regarding any issues raised during his deposition. He will also be examined on all issues identified by any of the parties in their Answers to Interrogatories, Rule 26(a) disclosures, and Response to Notice to Produce.

Justine Blankenship

This witness will testify to her position as president of Action Stock Transfer, the entity that dealt with the shares of Indo Global common stock that were issued to CCC and her communications with Plaintiffs, Randall Goulding and Mark Miller.

B. Pursuant to Rule 26(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Defendant, identifies the following documents, electronically stored information, and tangible things in its possession, custody or control that it may use to support its claims or defenses:

1. Any records subpoenaed by any of the parties to this case;
2. Any records from Wyoming and Colorado secretary of state offices;
3. Any email communications between any of the Plaintiffs with each other or with Randall Goulding;
4. Any email communications between Mark Miller and any of the Plaintiffs or with Randall Goulding.
5. Any email communications between Mark Miller and Action Stock Transfer;
6. Any email communications between any of the Plaintiffs and/or Randall Goulding and Action Stock Transfer;
7. Any corporate records for CCC;

C. Pursuant to Rule 26(a)(1)(A)(iii) of the Federal Rules of the Civil Procedure, Defendant, Mark Miller, states that a computation of each category of damages is not applicable to this party.

D. Pursuant to Rule 26(a)(1)(A)(iv) of the Federal Rules of Civil Procedure, Defendant, Mark Miller does not have any insurance agreements relating to this matter.

Thomas F. Burke, Esq.
JOHNSON & BELL, LTD.
33 W. Monroe Street, Suite 2700
Chicago, IL 60603
burket@jbltd.com

Respectfully submitted,
JOHNSON & BELL LTD

s/Thomas F. Burke
One of the Attorneys for Defendant